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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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In the matter of)
)
Amendment of Parts 2 and 90 of)
the Commission's Rules to Allocate)
the 5.850-5.925 GHz Band to the)
Mobile Service for Dedicated Short)
Range Communications of Intelligent)
Transportation Services)

SEP 14 1998

ET Docket No. 98-95
RM-9096
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

COMMENTS OF PANAMSAT CORPORATION

PanAmSat Corporation ("PanAmSat"), by its attorneys, hereby submits these comments regarding the above-referenced Notice of Proposed Rulemaking ("NPRM"). PanAmSat operates a global network of sixteen geostationary fixed satellite service ("FSS") space stations.

In the NPRM, the Commission has proposed to allocate 75 MHz of spectrum in the 5.850-5.925 GHz band for use by dedicated short range communications of intelligent transportation systems ("ITS"). The 5.8 GHz band currently is allocated on a co-primary basis for Government Radiolocation Service and non-Government FSS uplink operations. ISM, Part 15 technologies, and the Amateur Radio Service also are permitted to operate in this band.

Although PanAmSat is concerned by the increasing congestion in all of the FSS uplink bands, it does not appear that, by itself, the proposed allocation for ITS systems, operating within the technical parameters proposed in the NPRM,¹ will cause harmful interference to FSS operations at 5.8 GHz. Thus, so long as ITS systems are required to

¹ NPRM ¶¶ 28-32.

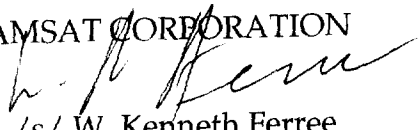
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operate within those parameters, PanAmSat does not oppose the allocation of the 5.8 GHz band for ITS services.

Respectfully submitted,

PANAMSAT CORPORATION

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